

BLANK ROME LLP

Todd M. Malynn (SBN 181595)

todd.malynn@blankrome.com

Arash Beral (SBN 245219)

arash.beral@blankrome.com

Todd M. Malynn (SBN 181595)

jamison.gilmore@blankrome.com

2029 Century Park East | 6th Floor

Los Angeles, CA 90067

Telephone: 424.239.3400

Facsimile: 424.239.3434

Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**DECLARATION OF TODD M.
MALYNN IN SUPPORT OF
KOREN PARTIES' MOTION IN
LIMINE TO PRECLUDE
EVIDENCE, TESTIMONY, AND
ARGUMENT REGARDING THIS
COURT'S PRELIMINARY
INJUNCTION, CONTEMPT
ORDERS, AND SANCTIONS**

*[Filed concurrently with Motion in
Limine and [Proposed] Order]*

Date: August 8, 2025

Time: 10:00 a.m.

Complaint Filed: May 31, 2024

Trial Date: August 18, 2025

160850.00001/154558939v.1

**DECLARATION OF TODD M. MALYNN IN SUPPORT OF
KOREN PARTIES' MOTION IN LIMINE NO. 1**

limited liability company and DOES 1
through 100, inclusive,

Defendants.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
California limited liability company; GK
CAPITAL GROUP, LLC, a California
limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

Counter-Claimants,

v.

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Counter Defendant.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
California limited liability company; GK
CAPITAL GROUP, LLC, a California
limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
INTERNATIONAL USA, INC., a California
corporation; CINCO CORPORATION, a
Philippines corporation; and ROES 1 through
10, inclusive,

Third Party Defendants.

DECLARATION OF TODD M. MALYNN

I, Todd M. Malynn, declare as follows:

1. I am a partner at Blank Rome LLP, counsel of record for PCJV USA, LLC, Guy Koren and affiliated Defendants (collectively, the “Koren Parties”). I have personal knowledge of the facts herein and I could testify competently thereto.

2. Attached as **Exhibit 1** is a true and correct copy of a June 18, 2025 letter my associate sent to SPAVI’s counsel, Michael Murphy and Matthew Follett, requesting to confer regarding Koren Parties’ anticipated Motion *in Limine*.

3. On June 20, 2025, Arash Beral, my partner, and I met and conferred with SPAVI’s counsel. During the conference, Mr. Beral and I explained why reference, evidence, and argument regarding the Preliminary Injunction Order and ensuing contempt Orders and sanctions should be precluded. Mr. Murphy stated the Preliminary Injunction Order would not be relied on to establish liability, but intended to rely on the contempt Order to prove intent. We disagreed with his position.

4. Attached as **Exhibit 2** is a true and correct copy of a June 23, 2025 service email from my associate that served the Motion *in Limine* No. 1 on SPAVI.

5. An opposition was not served by the June 30, 2025 deadline.

6. So as not to waive Koren Parties’ right to file the noticed motion *in limine*, Koren Parties file their motion pursuant to the pretrial and trial conference order (Dkt. #30) as the Order denying SPAVI’s *ex parte* application (Dkt. #208) does not reopen deadlines already passed to Koren Parties' prejudice.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed July 3, 2025, within the United States its territories, possessions, or commonwealths.

By: 

Todd M. Malynn